

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

FLORENCE DIVISION

Ray Harrison, on behalf of himself and those similarly situated,	)	Civil Action No. 4:11-cv-01307-TLW
	)	
	)	
Plaintiff,	)	<b><u>CONSENT MOTION FOR</u></b>
	)	<b><u>EXTENSION OF TIME TO RESPOND</u></b>
vs.	)	<b><u>TO COMPLAINT</u></b>
	)	
The Citizens Bank,	)	
	)	
Defendants.	)	
_____	)	

Pursuant to Local Civil Rule 6.01, DSC, and with consent of Plaintiff, Defendant The Citizens Bank hereby moves for an Order extending its time to answer, move pursuant to Rule 12 of the Federal Rules of Civil Procedure, or otherwise respond to the Complaint filed in the above-captioned case. This Motion is made on the following grounds:

1. The response to the Complaint is currently due on July 14, 2011.
2. The deadline to answer, move pursuant to Rule 12, or otherwise plead in response to the Complaint was previously extended once with Plaintiff's consent.
3. Defendant requests that the deadline be extended by 20 days to August 3, 2011.
4. At this time, there are no other deadlines scheduled in this matter, and an extension of time to respond to the Complaint will not affect other deadlines.
5. The reason for this extension is that Plaintiff and Defendant have been investigating the facts and a potential early resolution of this matter and need time to continue that investigation.

6. Defendant requests that the Court enter an Order extending the deadline for Defendant's response to the Complaint to August 3, 2011.

7. Undersigned counsel consulted with opposing counsel, and counsel for Plaintiff consent to the request.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: /s/ Brian M. Barnwell

B. Rush Smith III

Federal Bar No. 5031

E-Mail: rush.smith@nelsonmullins.com

Brian M. Barnwell

Federal Bar No. 10624

E-Mail: brian.barnwell@nelsonmullins.com

1320 Main Street / 17th Floor

Post Office Box 11070 (29211-1070)

Columbia, SC 29201

(803) 799-2000

*Attorneys for Defendant*

By: /s/ James M. Griffin

James M. Griffin, Fed. ID 1053

Margaret N. Fox, Fed. ID 10576

GRIFFIN LLC

Post Office Box 999

Columbia, South Carolina 29202

Tel.: (803) 744.0800

Fax: (803) 744.0805

Michael P. Lewis (*pending pro hac vice admission*)

THE LEWIS FIRM PLLC

901 New York Ave., N.W., Suite 550

Washington, D.C. 20001

Tel.: (202) 630-6257

Fax: (888) 430-6695

*Attorneys for Plaintiff*

Columbia, South Carolina  
July 1, 2011